

February 6, 2002

Sandra Adams
Iowa Wireless Services, LP
11358 Aurora Avenue
Urbandale, Ia 50322

Dear Sandra,

Enclosed is the Joint Petition for the Wireless Interconnection Agreement between Iowa Wireless Services, LP and Ameritech Illinois. Our Commission also requires an original Verification from both parties, signed and notarized. Attached is a sample of our verification.

Please return the signed Joint Petition and notarized verification.

My address is:

Mary C. Velez
% Ameritech
225 W. Randolph St. HQ27C
Chicago, IL 60606

Any questions, please feel free to call me on 312 551-9150.

Sincerely,

Enclosures

February 14, 2002

Ms. Donna Caton, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62794-9280

Dear Ms. Caton,

Enclosed please find the Joint Petition for Approval of Wireless Interconnection Agreement between Iowa Wireless Services, LP and Ameritech Illinois.

Please acknowledge receipt by returning the extra copy of this letter.

Sincerely,

Enclosures

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

IOWA WIRELESS SERVICES, LP)	
and ILLINOIS BELL TELEPHONE COMPANY)	
(Ameritech Illinois))	02 - _____
)	
Joint Petition for Approval of Wireless)	
Interconnection Agreement dated January 29, 2002,)	
pursuant to 47 U.S.C. §§ 252)	

**Joint Petition for Approval of Wireless Interconnection Agreement
Between Iowa Wireless Services, LP
And Ameritech Illinois**

Joint Petitioners, Iowa Wireless Services, LP and Illinois Bell Telephone Company (“Ameritech Illinois”), hereby file the attached wireless interconnection agreement dated January 29, 2002 (the “Agreement”) between Iowa Wireless Services, LP (“Iowa”) and Ameritech Illinois for review and approval by the Commission pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (the “Act”) (47 U.S.C. §§ 252 (a)(1) and 252(e). For their Joint Petition, Iowa and Ameritech Illinois state as follows:

1. The Agreement was arrived at through negotiations between the parties as contemplated by Section 252(a)(1) of Act and addresses reciprocal compensation provided pursuant to Section 251 of the Act.
2. As contemplated by Section 252 (e)(2)(A) of the Act, the Agreement, nor any portion thereof, discriminates against any telecommunications carrier not a party to the Agreement and the implementation of the Agreement, will not be inconsistent with the public interest, convenience and necessity. Ameritech Illinois provides the attached verified statement of Eric Larsen.
3. In accordance with Section 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.
4. Copies of the agreement are available for public inspection in Ameritech Illinois and Iowa’s public offices.

WHEREFORE, Joint Petitioners respectfully request that the Commission approve the Agreement in accordance with Section 252(e) of the Act as soon as possible.

Dated this _____ day of February, 2002

AMERITECH ILLINOIS

Mark Kerber and James Huttenhower
Ameritech Services, Inc.
225 West Randolph Street, 25D
Chicago, Illinois 60606
312 727 7140

IOWA WIRELESS SERVICES, LP

Sandra Adams
Iowa Wireless Services, LP
11358 Aurora Avenue
Urbandale, Ia 50322
(515) 258-7509
Regulatory Manager

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

IOWA WIRELESS SERVICES, LP)	
and ILLINOIS BELL TELEPHONE COMPANY)	
(Ameritech Illinois))	02 - _____
)	
Joint Petition for Approval of Wireless)	
Interconnection Agreement dated January 29, 2002,)	
pursuant to 47 U.S.C. §§ 252 (a)(1))	

STATEMENT IN SUPPORT OF JOINT PETITION FOR APPROVAL

I, Eric Larsen, am Director-Negotiations for Ameritech Services, Inc./Illinois Bell Telephone Company Industry Markets, and hereby submit this Statement in Support of the Joint Petition for Approval of a Wireless Interconnection Agreement between Iowa Wireless Services, LP and Ameritech Illinois.

The reciprocal compensation agreement (the "Agreement") between Iowa Wireless Services, LP ("Iowa") and Illinois Bell Telephone Company ("Ameritech Illinois") was reached through voluntary negotiations between the parties. Accordingly, Iowa and Ameritech Illinois are requesting approval pursuant to Sections 252(a)(1) and Section 252(e) of the Telecommunications Act of 1996 (sometimes referred to as the "Act").

The parties engaged in good faith negotiations pursuant to Sections 251 and 252 of the Act. The Agreement was reached January 29, 2002 and expires February 28, 2004. The Agreement establishes the financial and operational terms for the transport and termination of local traffic between Ameritech Illinois' and Iowa networks based on mutual and reciprocal compensation. The Agreement shall automatically renew and remain in full force and effect for one (1) year periods ("renewal term") after expiration of the initial term or a renewal term, unless a 120 day notice is made by one party to the other to terminate Agreement.

This Agreement provides for reciprocal compensation rates to become effective upon Commission approval of the Agreement.

The rates set forth in the Agreement are reasonable. No new rate elements are being introduced as a result of the changes specified in this Agreement, but existing schedules are being restructured. The rates to be charged to Iowa are lower than what currently apply in Ameritech Illinois' Type 2 interconnection tariff (Ill. C.C. No. 16), and closer to actual costs.

Under the Separate Trunk Groups provision of the Agreement, Paragraphs 6.1 Iowa trunks shall be provisioned and maintained at the P.01 grade of service.

Under Sections 252(e)(1) and (2) of the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof "... discriminates against a telecommunications carrier not a party to the agreement" or "...implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity". Because the Agreement is the product of voluntary negotiation, it does not have to comply with the standards set forth in Sections 251 (b) and (c), thus rendering inapplicable the pricing standards set forth in Section 252 (d).

The Agreement is not discriminatory. Ameritech Illinois will make these arrangements available to any other commercial mobile radio service (CMRS) provider operating within Ameritech Illinois' service territory. Other CMRS providers can also negotiate their own arrangements pursuant to the applicable provisions of the Act.

The Agreement is consistent with the public interest, convenience and necessity. It establishes an appropriate reciprocal compensation arrangement between Ameritech Illinois and Iowa for the completion of intraMSA traffic in Illinois. In Docket 95-185, the FCC indicated that such negotiated arrangements are to be encouraged, in view of the status of Iowa carriers in the provisioning of local exchange services.¹

The Agreement meets all the requirements of the Act and the Commission should approve it.

¹ In the matter of Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, CC Docket No. 95-185, Notice of Proposed Rulemaking, rel. January 11, 1996, at 43 (90). The FCC specifically held that "(i) ILECs and CMRS providers were to negotiate interconnection arrangements ... the public interest would be served while avoiding the need for intervention." Id.